

PRERAK SHAH
Deputy Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division

HAYLEY A. CARPENTER (CA 312611)
Trial Attorney
U.S. Department of Justice
Environment and Natural Resources Division
P.O. Box 7611
Washington, D.C. 20044-7611
(202) 305-0242
hayley.carpenter@usdoj.gov

Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CENTER FOR BIOLOGICAL DIVERSITY, *et al.*,
Plaintiffs,
v.
USDA APHIS WILDLIFE SERVICES, *et al.*,
Federal Defendants.

Case No. 3:19-cv-05362-LB

**STIPULATION AND ~~[PROPOSED]~~
ORDER OF DISMISSAL**

The Parties to this action are concurrently filing a Settlement Agreement that resolves Plaintiffs' claims in this case. In consideration of that Settlement Agreement, the Parties stipulate pursuant to Fed. R. Civ. P. 41 that this case may be dismissed with prejudice. The Parties further request this Court retain jurisdiction over this case for the sole purpose of enforcing compliance with the terms of the Settlement Agreement or resolving any disputes concerning the implementation of the Settlement Agreement as set forth in the Parties' Agreement.

SO STIPULATED:

Respectfully submitted this 6th day of April, 2020.

/s/ Collette L. Adkins (with permission on
April 6, 2020)

COLLETTE L. ADKINS, MN Bar No.
035059X
(pro hac vice)
Center for Biological Diversity
P.O. Box 595
Circle Pines, MN 55014-0595
Phone: (651) 955-3821
Fax: (510) 844-7150
cadkins@biologicaldiversity.org

CRISTINA R. STELLA (CA Bar No.
305475)
Animal Legal Defense Fund
6439 E. Maplewood Ave.
525 E. Cotati Ave.
Cotati, CA 94931-4091
Phone: (707) 795-2533 ext. 1055
Fax: (707) 795-7280
cstella@aldf.org

Attorneys for Plaintiffs

PRERAK SHAH

Acting Deputy Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division
/s/ Hayley A. Carpenter

HAYLEY A. CARPENTER, CA Bar No.
312611
Trial Attorney
Natural Resources Section
PO Box 7611
Washington, DC 20044-7611
(202) 305-0242
hayley.carpenter@usdoj.gov

Attorneys for Defendants

~~PROPOSED~~ ORDER

The Stipulation set forth above is APPROVED, and accordingly it is HEREBY ORDERED that in consideration of the Settlement Agreement concurrently filed by the Parties, this case is hereby dismissed with prejudice, but the Court retains jurisdiction over this case for the sole purpose of overseeing compliance with the terms of the Settlement Agreement and resolving any disputes concerning the implementation of the Settlement Agreement as set forth in the Parties' agreement.

DATED: April 6, 2020



LAUREL BEELER
UNITED STATES MAGISTRATE JUDGE